



1155 Avenue of the Americas
22nd Floor
New York, NY 10036-2711

T +1.212.262.6900
F +1.212.977.1649
PerkinsCoie.com

May 11, 2022

Adam R. Mandelsberg
AMandelsberg@perkinscoie.com
D. +1.212.261.6867
F. +1.212.399.8067

VIA CM/ECF

Hon. Lorna G. Schofield
United States District Judge
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square - Courtroom 1106
New York, New York 10007

Re: *Jose Rodriguez v. Target Corporation*, Case No. 1:22-cv-02982 (LGS)

Dear Judge Schofield:

Perkins Coie LLP represents Defendant Target Corporation (“Target”) in the above-referenced action. Target respectfully submits this letter motion pursuant to Rule 1(B)(2) of Your Honor’s Individual Practices to request a 30-day extension for Target to answer, move, or otherwise respond to the Complaint—extending the deadline from May 17 to June 17, 2022.

Plaintiff Jose Rodriguez (“Plaintiff”) filed the Complaint on April 12, 2022. Target was served with the Complaint on April 26, 2022. Based on the date of service, Target’s time to answer, move, or otherwise respond to the Complaint is currently May 17, 2022.

The requested extension will allow Target time to further investigate the matter and will also allow for a uniform briefing schedule. There have been no previous requests for an adjournment or extension in this matter, and Plaintiff’s counsel has communicated that he does not oppose this request.

We are available to answer any questions that Your Honor may have. Thank you in advance for your consideration of this request.

**Application GRANTED. Plaintiff shall answer, move or
otherwise respond to the Complaint by June 17, 2022.**

**Dated: May 13, 2022
New York, New York**

A handwritten signature in black ink, appearing to read "Lorna G. Schofield".

**LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE**

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Respectfully submitted,

/s/ Adam R. Mandelsberg
Adam R. Mandelsberg

cc: All counsel of record